
EXHIBIT O

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF GUAM

3 NANYA TECHNOLOGY CORP. and
4 NANYA TECHNOLOGY CORP. U.S.A.,

Case No. CV-06-00025

5 *Plaintiffs,*

DECLARATION OF
ANDREW HUFFSTETLER

6 v.

7 FUJITSU LIMITED and FUJITSU
8 MICROELECTRONICS AMERICA, INC.,

9 *Defendants.*

10
11 I, Andrew Huffstetler, hereby declare as follows:

12 1. My name is Andrew Huffstetler. I am over the age of 21 and am competent to
13 make this declaration. All of the statements set forth herein are true and correct and are based on
14 my professional practice and personal knowledge.

15 2. I am the Multimedia and Litigation Support Specialist for Shore Chan Bragalone
16 LLP. As part of my job responsibilities, I oversee certain reverse engineering and device
17 disassembly projects.

18 3. On June 21, 2007, I received Toyota Part No. 83291-47230, the instrument cluster
19 computer from a Toyota Prius automobile (hereinafter referred to as the "Prius Computer "). The
20 Prius Computer was shipped from DCH Brunswick Toyota/Scion. A true and correct copy of the
21 shipping invoice is attached hereto as Exhibit A. A true and correct copy of the credit card
22 receipt is attached hereto as Exhibit B.

23 4. Soon after receipt, I took photographs of the Prius Computer in its as-received
24 state. True and correct copies of these photographs are attached hereto as pages 1-4 of Exhibit

25 C.
26
27
28

1 5. After taking the as-received photographs, I cut the top edge support structure of
2 the Prius Computer's display with a Dremel tool and pulled the display away from the circuit
3 board. True and correct copies of photographs depicting this are attached hereto as pages 5-10 of
4 Exhibit C.

5
6 6. After cutting and pulling away the display, I inspected the circuitry revealed
7 underneath and found a microchip device bearing the part number "MB90583C-148." A true and
8 correct copy of a close-up photograph of the MB90583C device is attached hereto as page 11 of
9 Exhibit C.

10 7. I researched Fujitsu Ltd.'s website (www.fujitsu.com) and found a publicly-
11 available document titled "F²MC™-16LX 16-BIT MICROCONTROLLER MB90580C Series
12 Hardware Manual." True and correct copies of two particular pages from this document are
13 attached hereto as Exhibit D. Page 5 of this document (*i.e.*, the second page of Exhibit D)
14 confirms that the MB90583C device found in the Prius Computer is a member of Fujitsu's
15 MB90580C Series of 16-bit microcontrollers.
16

17 8. I researched Fujitsu Ltd.'s website (www.fujitsu.com) and found a publicly-
18 available document titled "16-bit Proprietary Microcontroller CMOS F²MC-16LX MB90580C
19 Series MB90583C/583CA/F583C/F583CA/587C/587CA/V580B." A true and correct copy of
20 the front page of this document is attached hereto as Exhibit E. The front page confirms lists the
21 MB90583C device found in the Prius Computer is a member of Fujitsu's MB90580C Series of
22 16-bit microcontrollers.
23

24 9. On June 21, 2007, I received a Nintendo DS Lite, which was shipped from Guam
25 by attorney Joseph Razzano and hand delivered to me by attorney Alfonso Garcia Chan. It is my
26 understanding that the Nintendo DS Lite was purchased from Toys N' Joys in Guam.
27
28

1 10. Soon after receipt, I took a photograph of the Nintendo DS Lite in its as-received
2 state. A true and correct copy of this photograph is attached hereto as page 1 of Exhibit F.

3 11. After taking the as-received photographs, I unattached the Nintendo DS Lite's
4 casing and game cartridge receiver and exposed the circuit board. True and correct copies of
5 photographs depicting this are attached hereto as pages 2-3 of Exhibit F.

6 12. After exposing the circuit board, I inspected the revealed circuitry and found a
7 microchip bearing a stylized "F" mark and the part number "82DBS02163C-70L." A true and
8 correct copy of a close-up photograph of the 82DBS02163C-70L device is attached hereto as
9 page 4 of Exhibit F.

10 13. I researched Fujitsu Ltd.'s website (www.fujitsu.com) and found a document titled
11 "MEMORY Mobile FCRAM™ CMOS 32M Bit (2 M word X 16 bit) Mobile Phone Application
12 Specific Memory MB82DBS02163C-70L." A true and correct copy of the front page of this
13 document is attached hereto as Exhibit G. The 82DBS02163C-70L device's numbering exactly
14 matches Fujitsu part no. MB82DBS02163C-70L's numbering after the "MB" prefix. This and
15 the front page confirms that the 82DBS02163C-70L found in the Nintendo DS Lite is the same
16 Fujitsu MB82DBS02163C-70L device described in Exhibit G.

17 14. On June 21, 2007, I received a Sony PlayStation Portable (hereinafter referred to
18 as "Sony PSP"). The Sony PSP was shipped from Guam by attorney Joseph Razzano and hand
19 delivered to me by attorney Alfonso Garcia Chan. It is my understanding that the Sony PSP was
20 purchased from Toys N' Joys in Guam.

21 15. Soon after receipt, I took photographs of the Sony PSP in its as-received state.
22 True and correct copies of these photographs are attached hereto as page 1-2 of Exhibit H.

1 16. After taking the as-received photographs, I unattached the Sony PSP's casing and
2 disassembled the device to expose its circuit board. True and correct copies of photographs
3 depicting this are attached hereto as pages 3-4 of Exhibit H.

4 17. After exposing the circuit board, I inspected the revealed circuitry and found a
5 microchip bearing a stylized "F" mark and the part number "MB44C012." True and correct
6 copies of close-up photographs of the MB44C012 device are attached hereto as pages 5-6 of
7 Exhibit H. Based on my review of the Fujitsu Ltd.'s website (www.fujitsu.com) and Fujitsu's
8 product marking and numbering scheme, the MB44C012 device has both the stylized "F" mark
9 and the "MB" prefix characteristic of Fujitsu semiconductor devices.

10 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE
11 UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

12 SIGNED ON THE 22 DAY OF JUNE, 2007

13 SIGNATURE



14 PRINTED NAME

15 Andrew H. Asstetler

EXHIBIT A

CUSTOMER COPY

EXHIBIT B

BRUNSWICK TOYOTA
1584 US RT 1
NO BRUNSWICK, NJ. 08902-
732-867-5185

Phone/Web

ID: 0010548510000000000022183

06/20/07

13:24:23

AVS Code:

AMEX

XXXXXXXXXX20021

CV2 Code: U

Appr Code: 261144

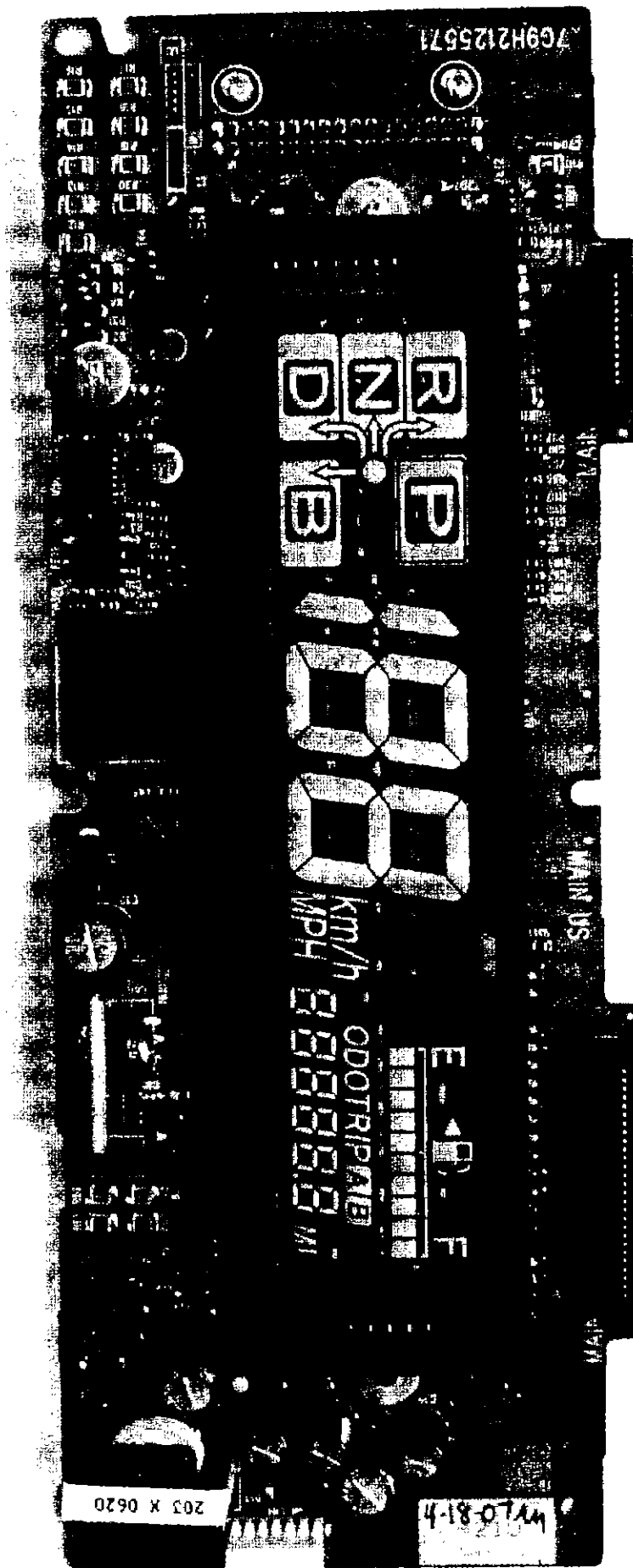
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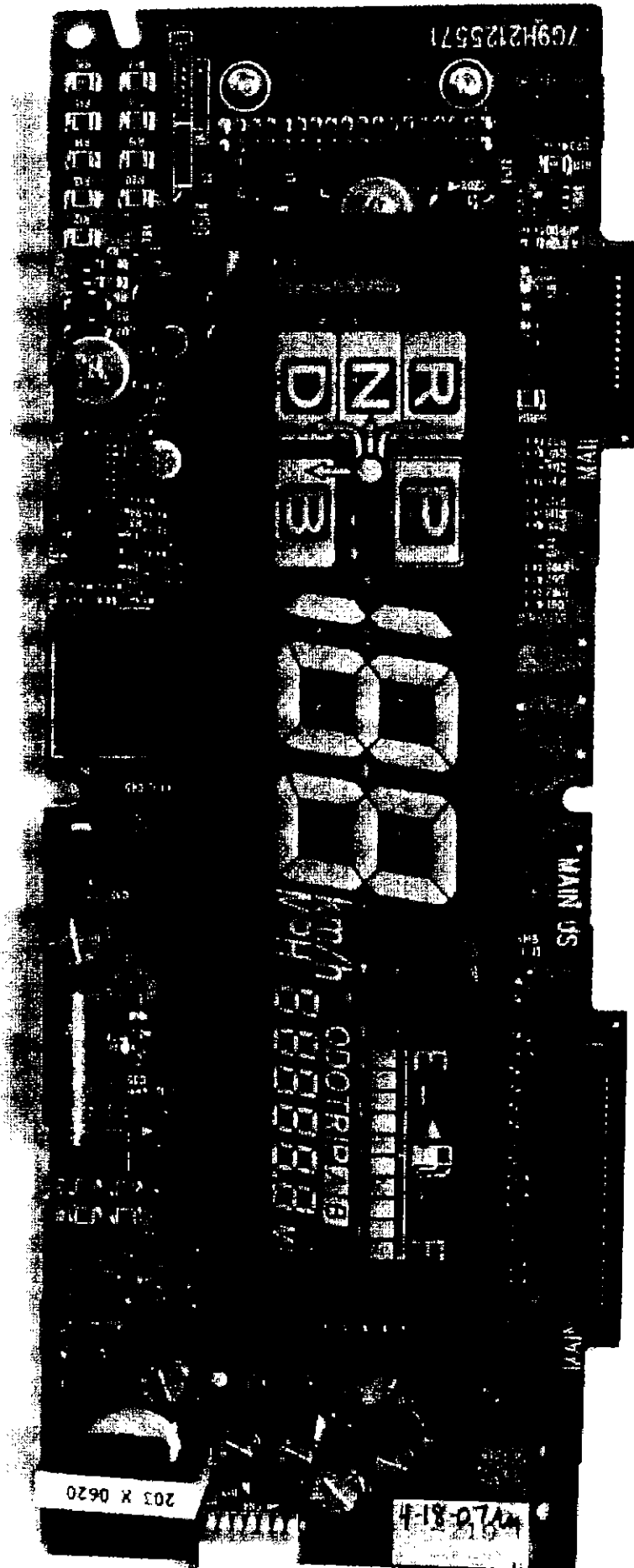
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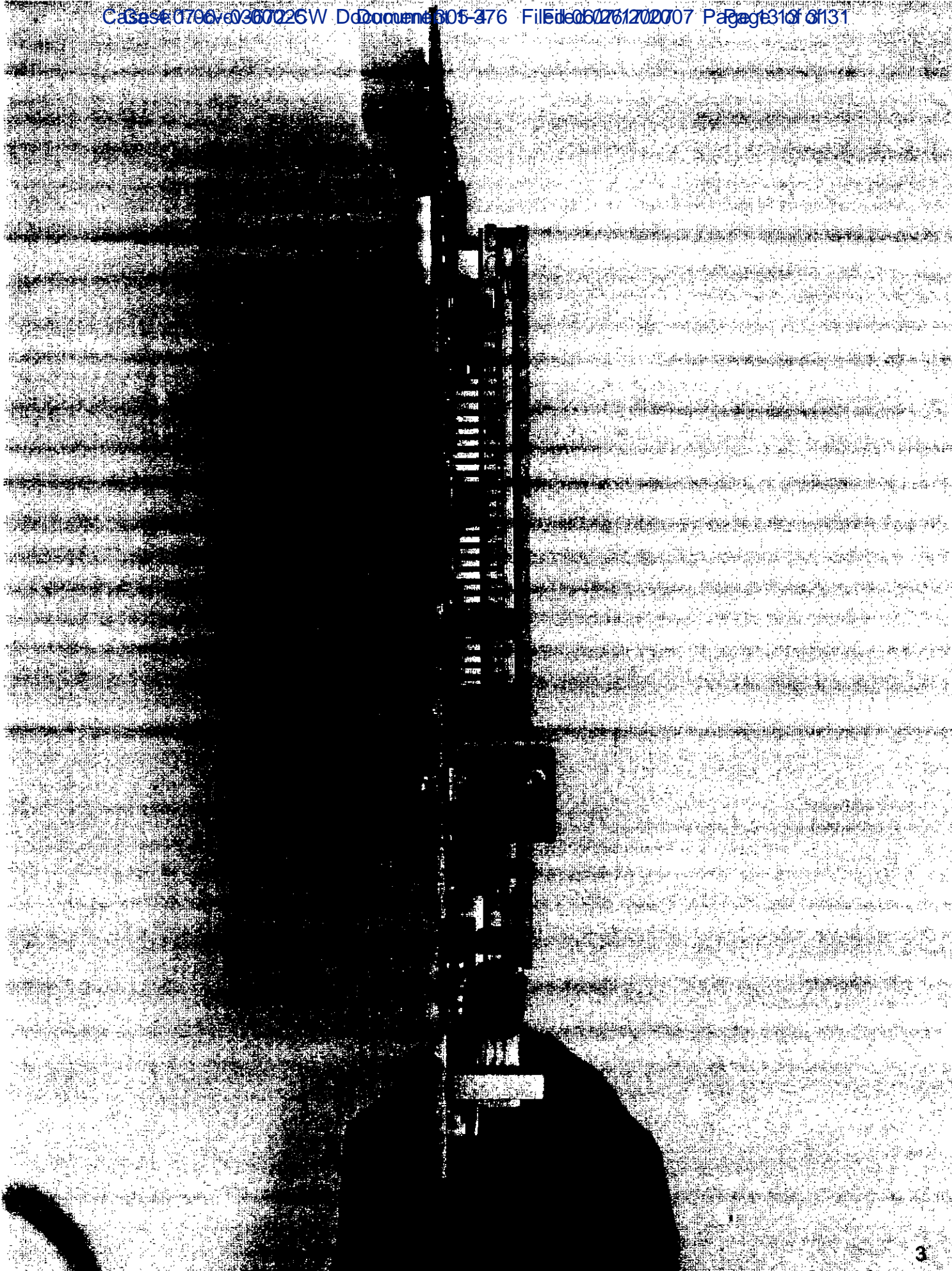
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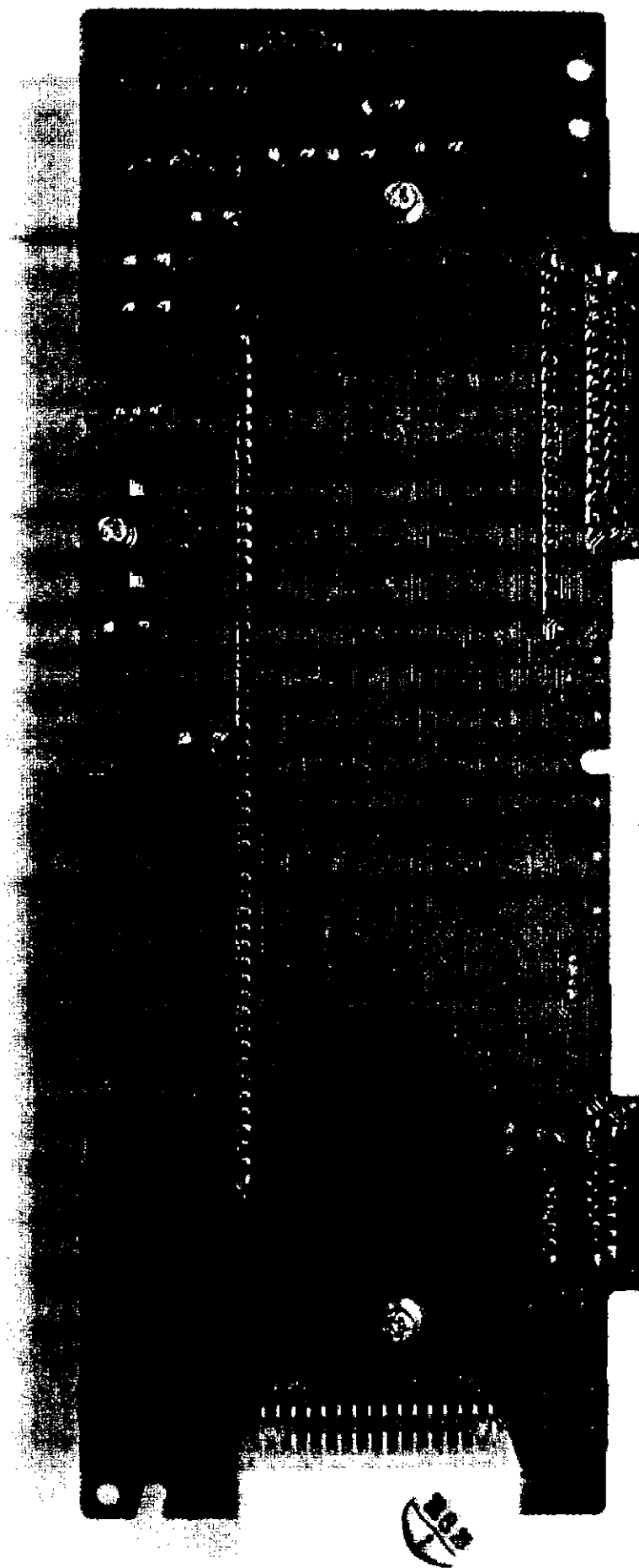
Customer Copy
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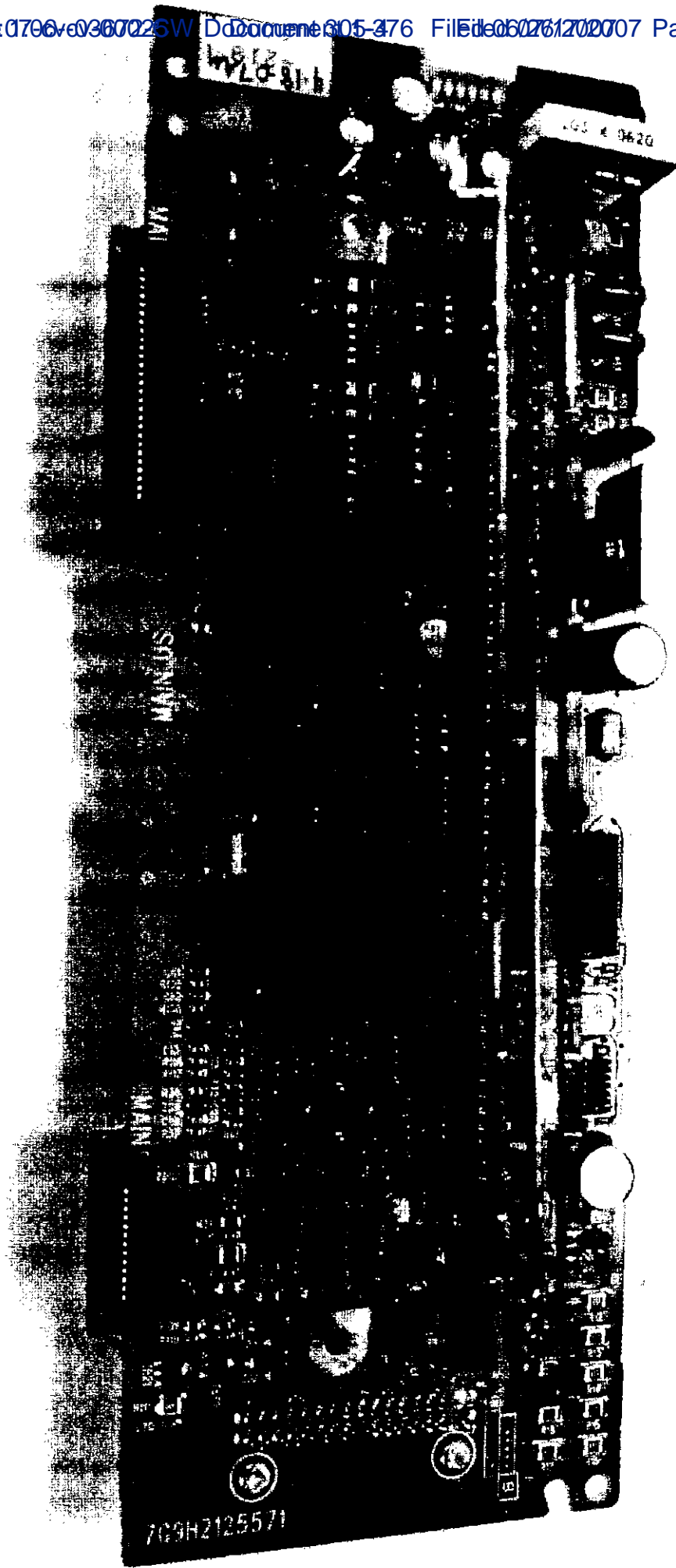
EXHIBIT C

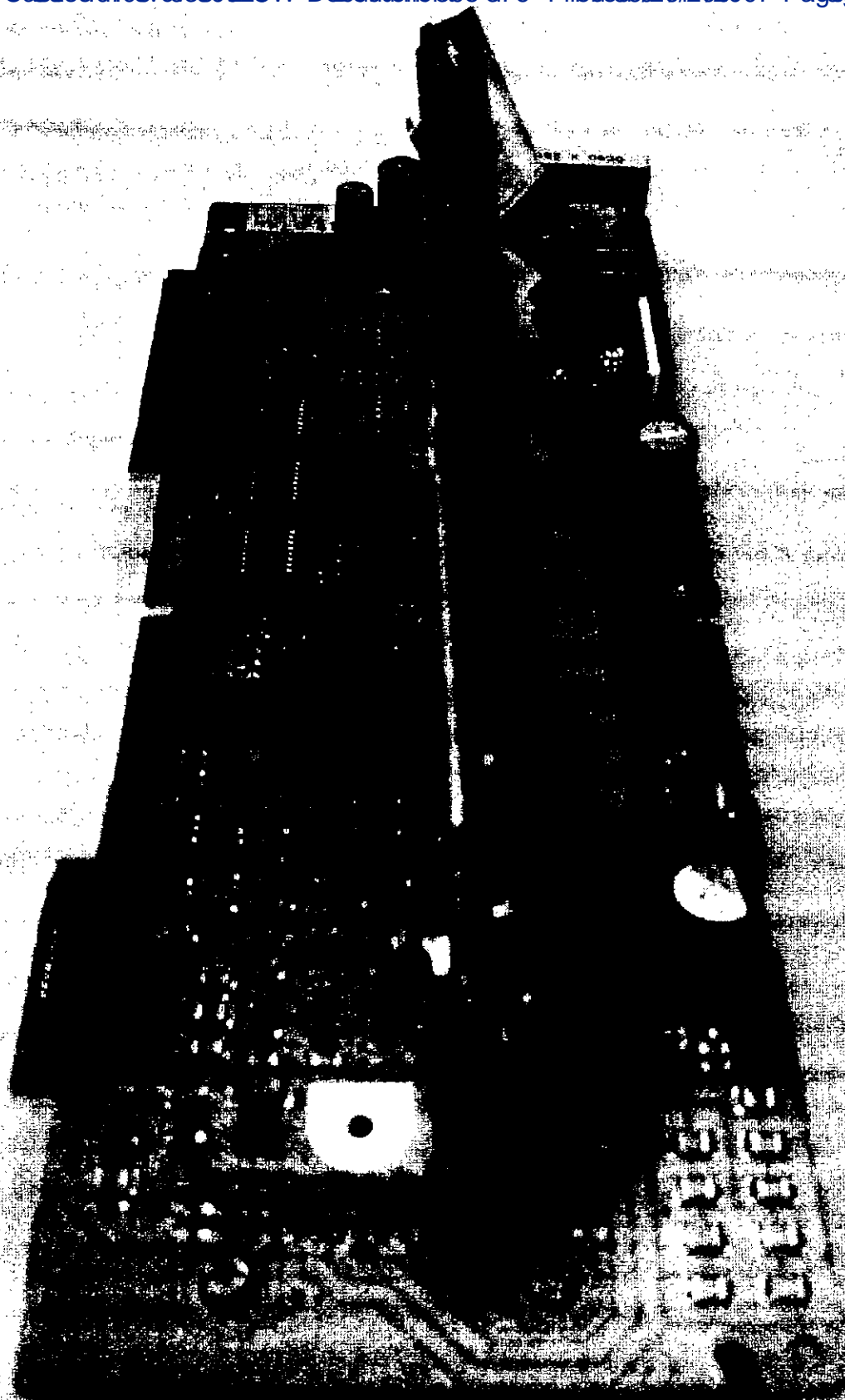


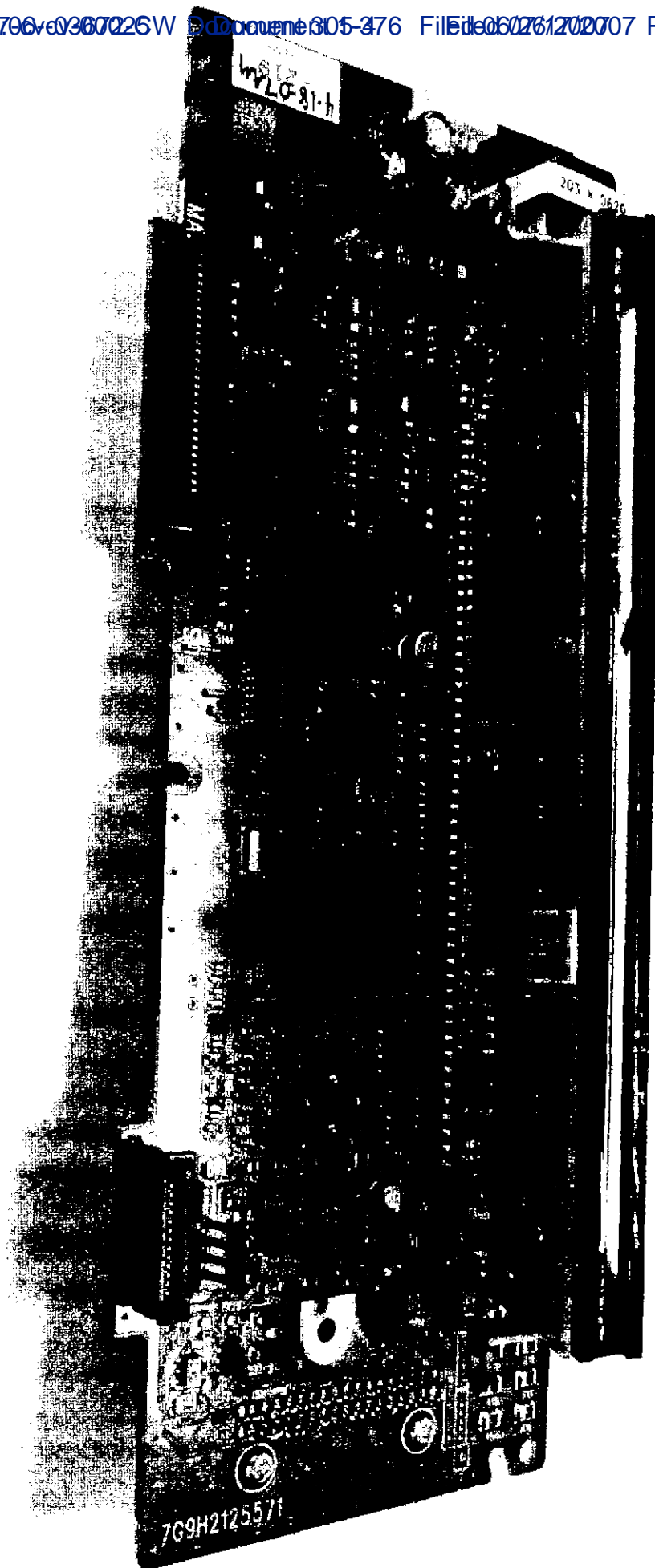


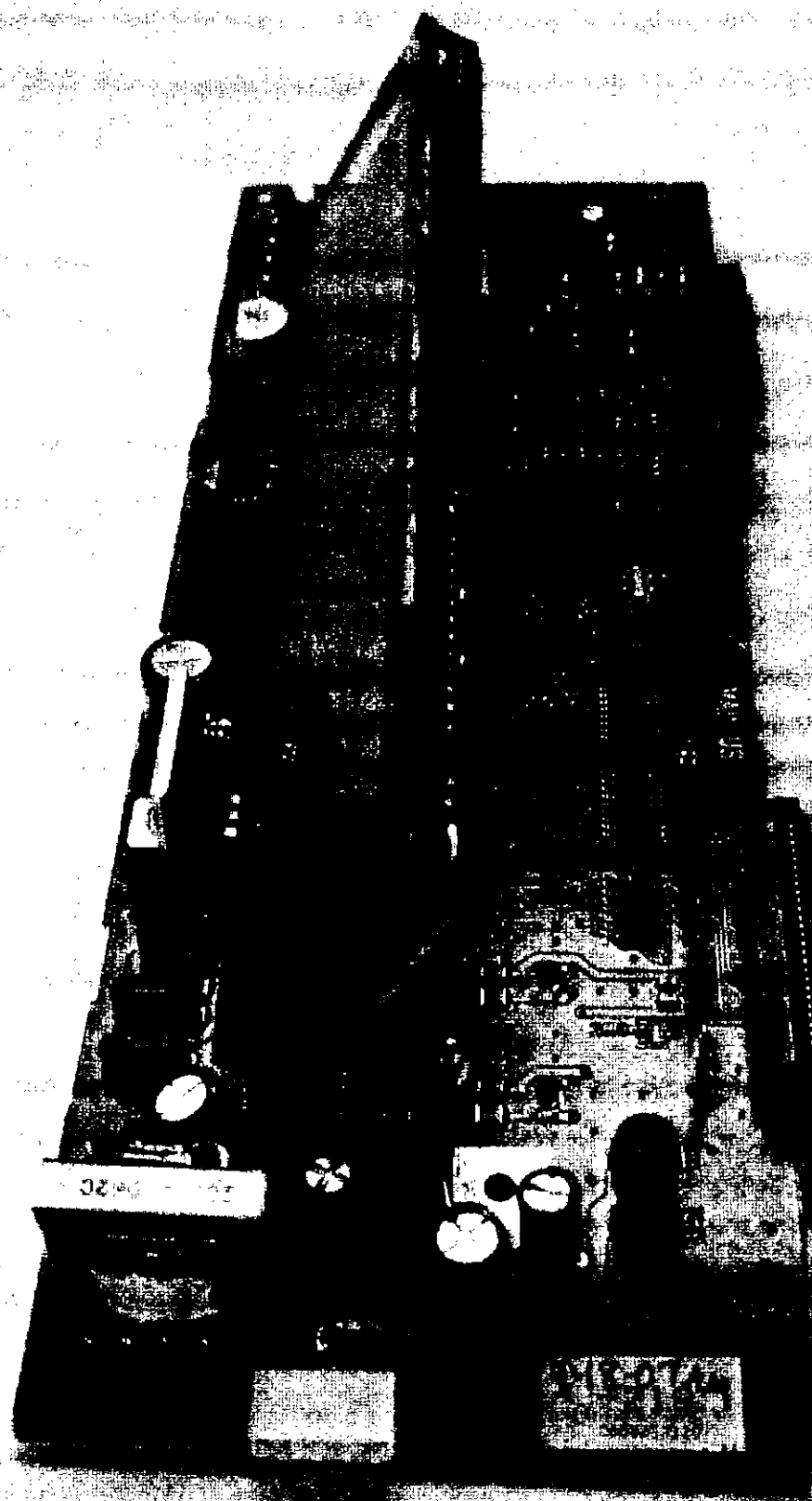


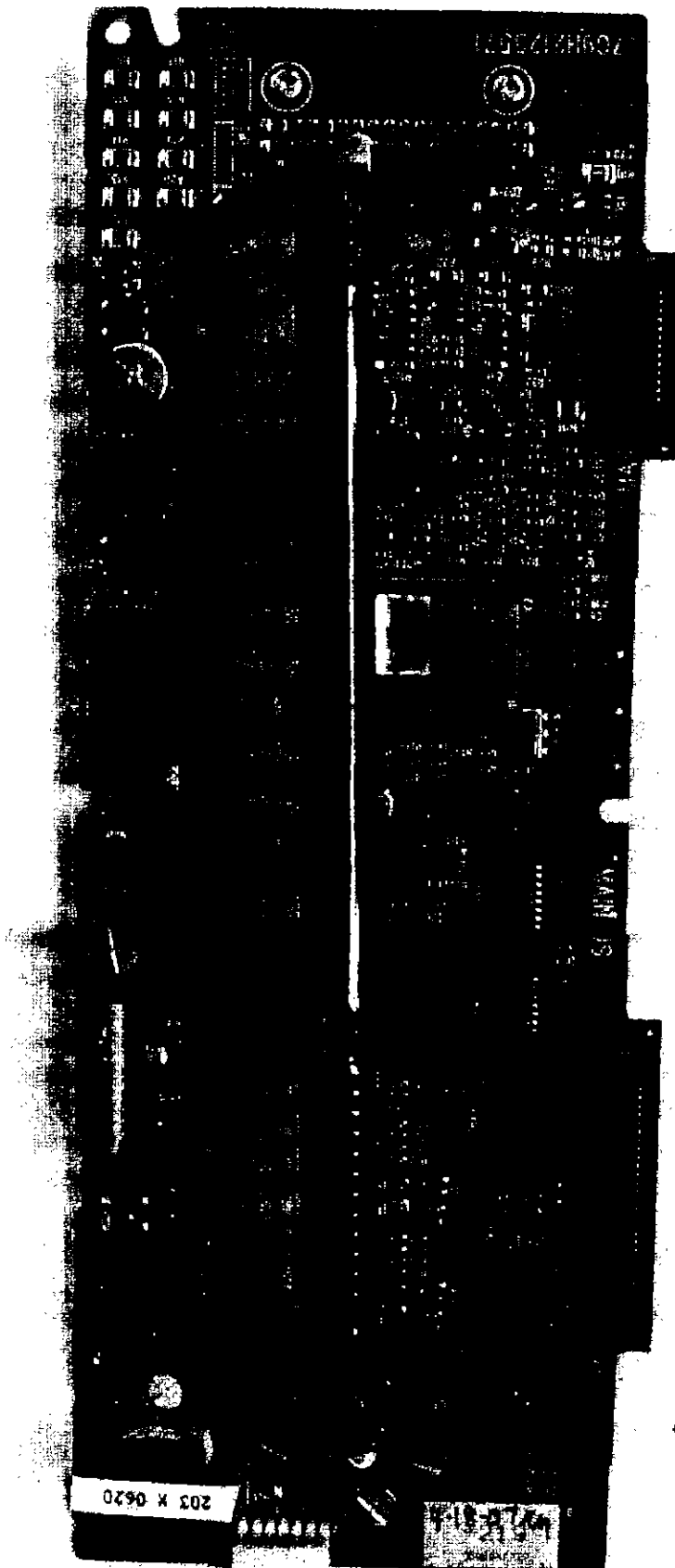


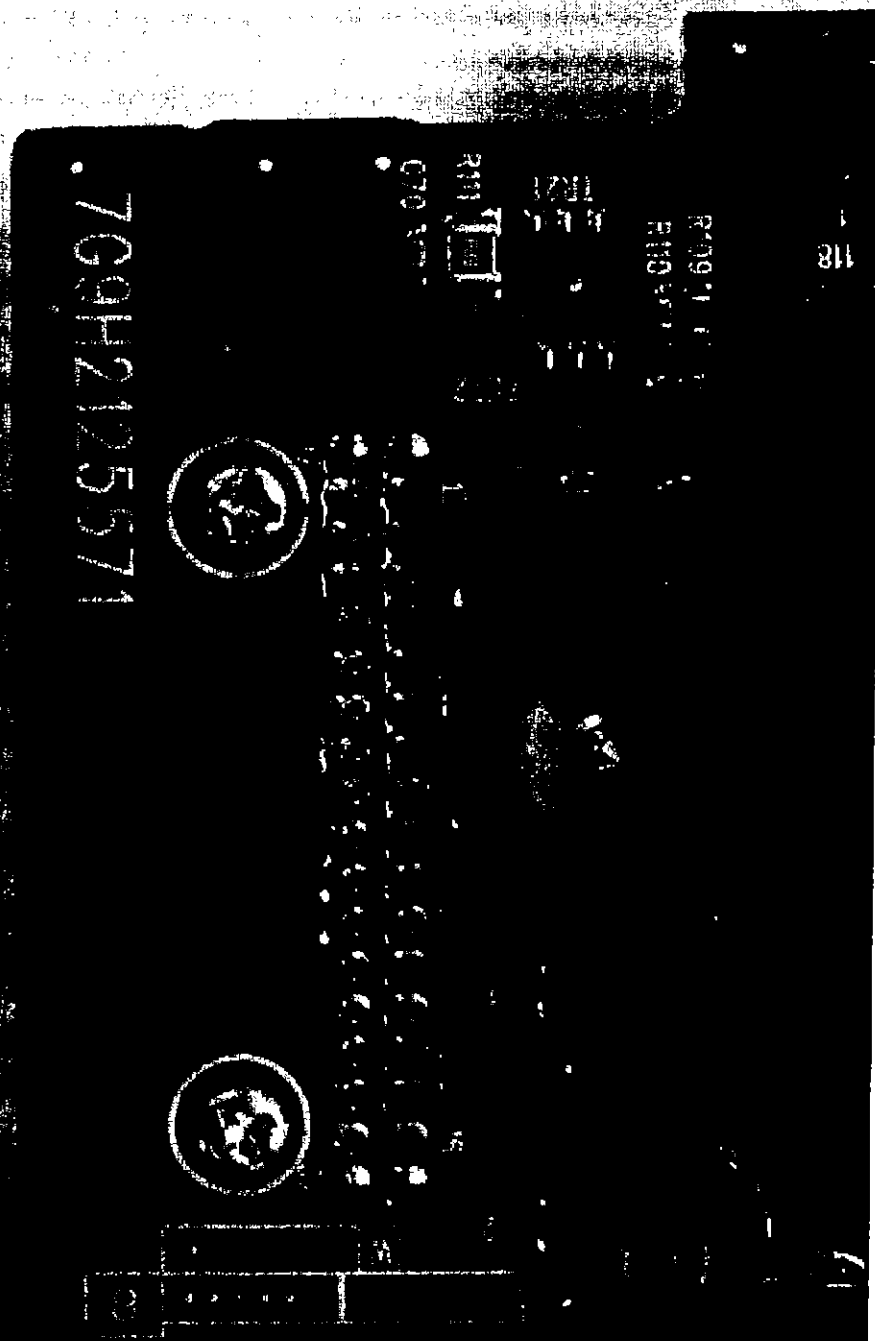












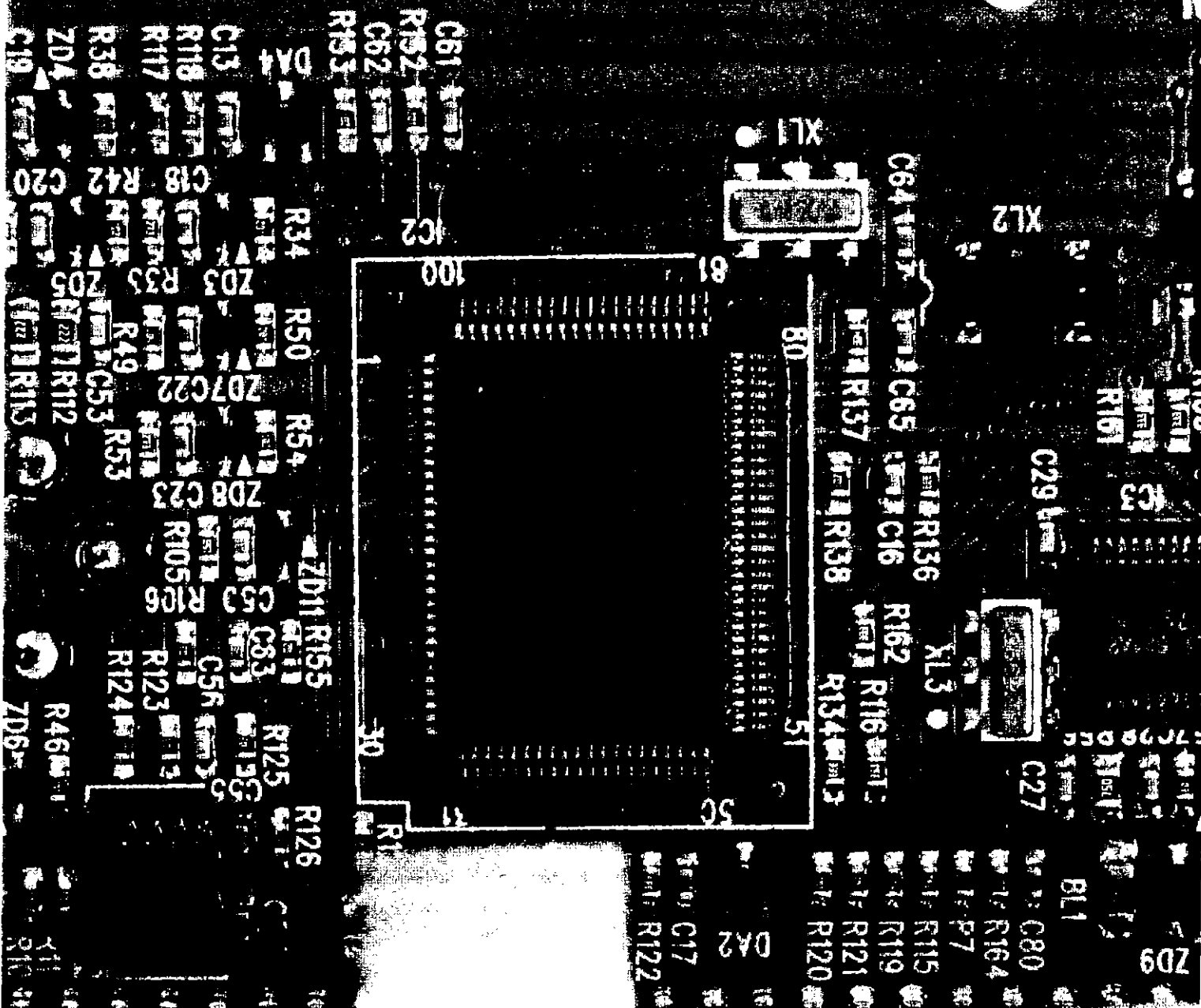


EXHIBIT D

FUJITSU SEMICONDUCTOR
CONTROLLER MANUAL

CM44-10111-2E

F²MCTM-16LX

16-BIT MICROCONTROLLER

MB90580C Series

HARDWARE MANUAL



1.2 Models Available

1.2 Models Available

Table 1.2-1 "MB90580C Series Models" lists the available models of the MB90580C series. Functions other than ROM and RAM capacity and clocks are common to all models. The MB90587C/CA does not have the IEBusTM Controller.

■ Models Available

Table 1.2-1 MB90580C Series Models

Item	MB90583C	MB90583CA	MB90587C	MB90587CA	MB90F583C	MB90F583CA	MB90V580B
ROM capacity	Mask ROM 128 Kbytes	Mask ROM 128 Kbytes	Mask ROM 64 Kbytes	Mask ROM 64 Kbytes	FLASH ROM 128 Kbytes	FLASH ROM 128 Kbytes	-
RAM capacity	6 Kbytes	6 Kbytes	4 Kbytes	4 Kbytes	6 Kbytes	6 Kbytes	6 Kbytes
Clock	Two clocks system	One clock system	Two clocks system	One clock system	Two clocks system	One clock system	Two clocks system
IEBus TM controller	Available	Available	None	None	Available	Available	Available
Dedicated power supply for emulator*	-	-	-	-	-	-	None

*: Setting of DIP switch S2 for using the emulation pod MB2145-507. For details, see Section 2.7 "Dedicated Power Pin for Emulator" in the Hardware Manual for MB2145-507.

Note:

For the evaluation device, use the MB90V580B. Also, if the one clock system is used, equip X0A and X1A with clocks from the tool side.

EXHIBIT E

**FUJITSU SEMICONDUCTOR
DATA SHEET**
DS07-13710-4E
■ DESCRIPTION

The MB90580C series is a line of general-purpose, Fujitsu 16-bit microcontrollers designed for process control applications which require high-speed real-time processing, such as consumer products.

While inheriting the AT architecture of the F²MC^{*1} family, the instruction set for the F²MC-16LX CPU core of the MB90580C series incorporates additional instructions for high-level languages, supports extended addressing modes, and contains enhanced multiplication and division instructions as well as a substantial collection of improved bit manipulation instructions. In addition, the MB90580C has an on-chip 32-bit accumulator which enables processing of long-word data.

The peripheral resources integrated in the MB90580C series include: an 8/10-bit A/D converter, an 8-bit D/A converter, UARTs (SCI) 0 to 4, an 8/16-bit PPG timer, 16-bit I/O timers (16-bit free-run timer, input capture units (ICUs) 0 to 3, output compare units (OCUs) 0 and 1), and an IEBus[™] controller ^{*2}.

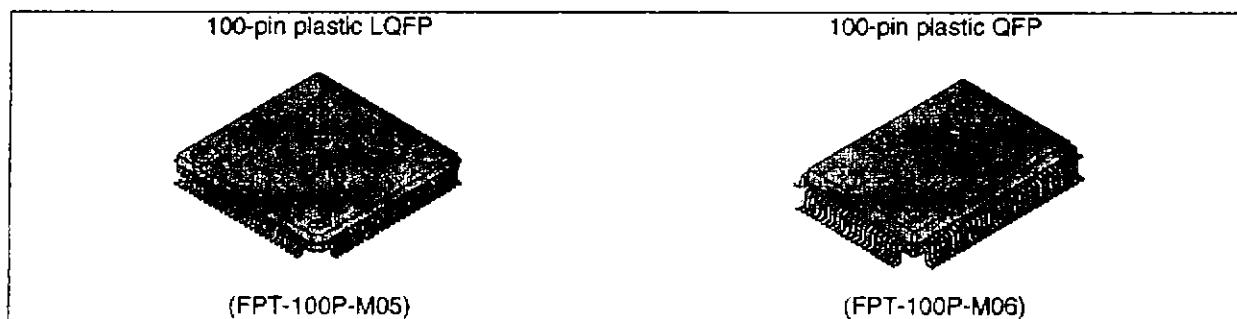
^{*1}: F²MC stands for FUJITSU Flexible Microcontroller, a registered trademark of FUJITSU LIMITED.

^{*2}: IEBus[™] is a trademark of NEC Corporation.

■ FEATURES

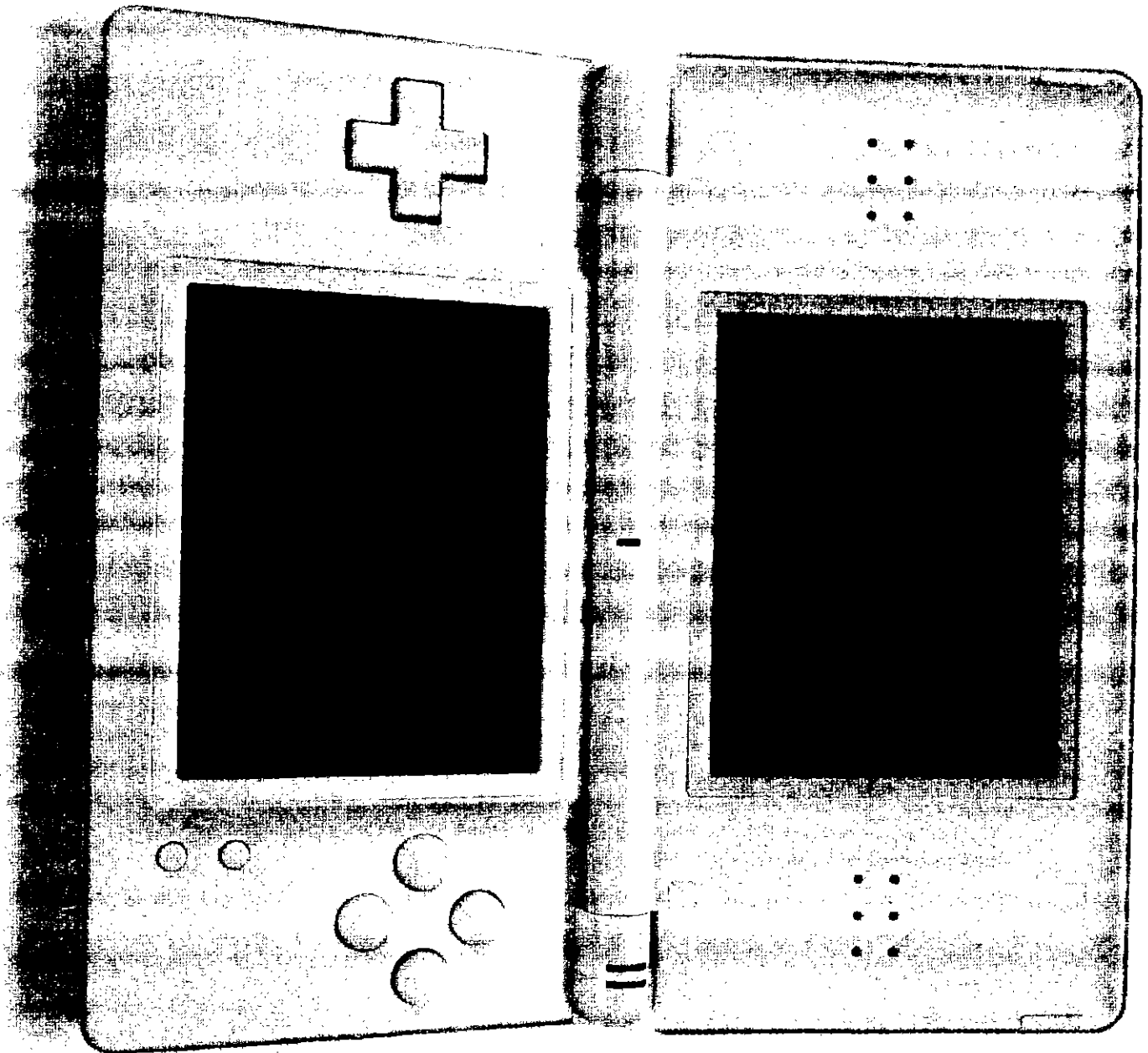
- Minimum execution time: 62.5 ns/4 MHz oscillation (Uses PLL clock multiplication) maximum multiplier = 4
- Maximum memory space
16 Mbyte
Linear/bank access

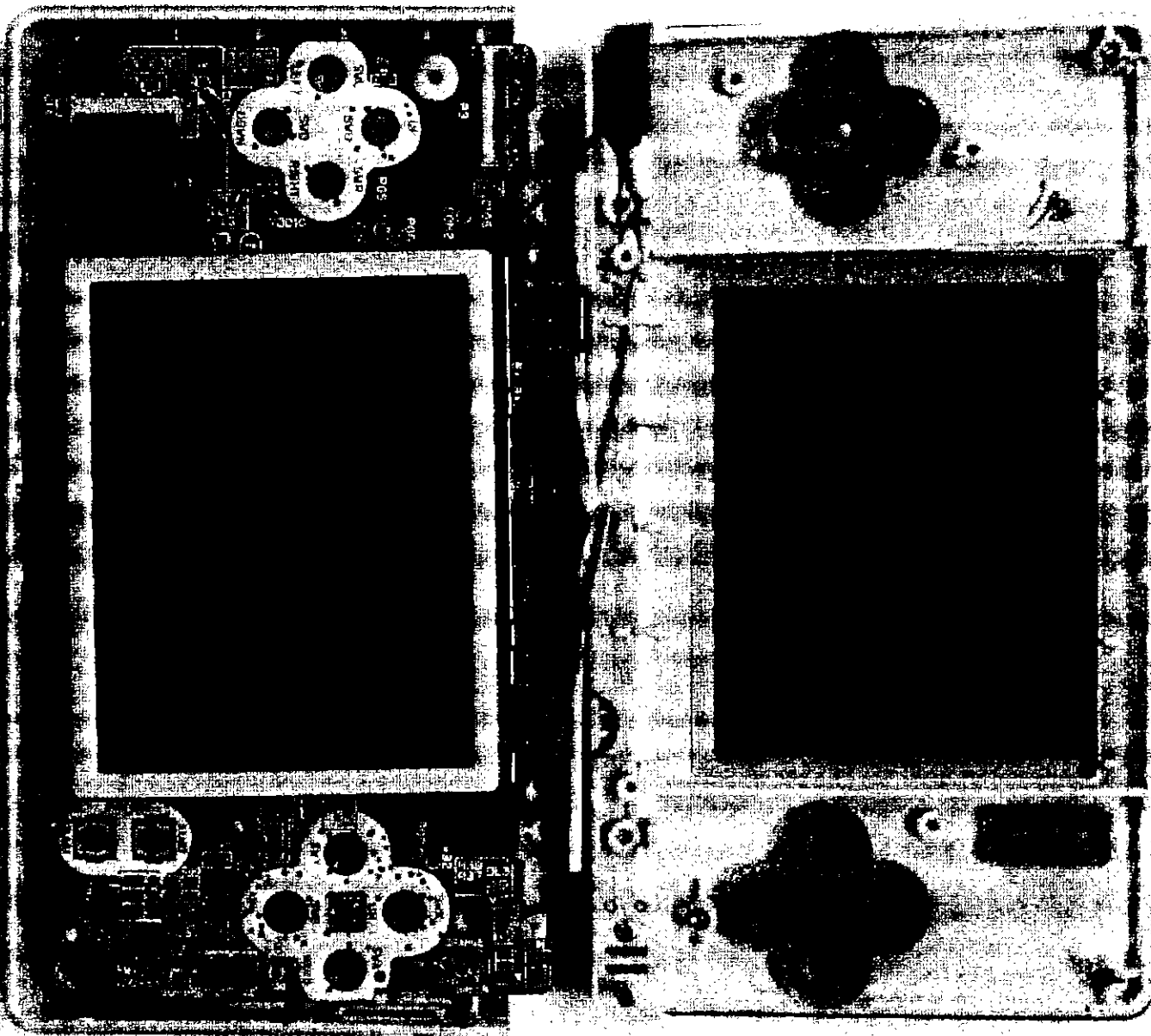
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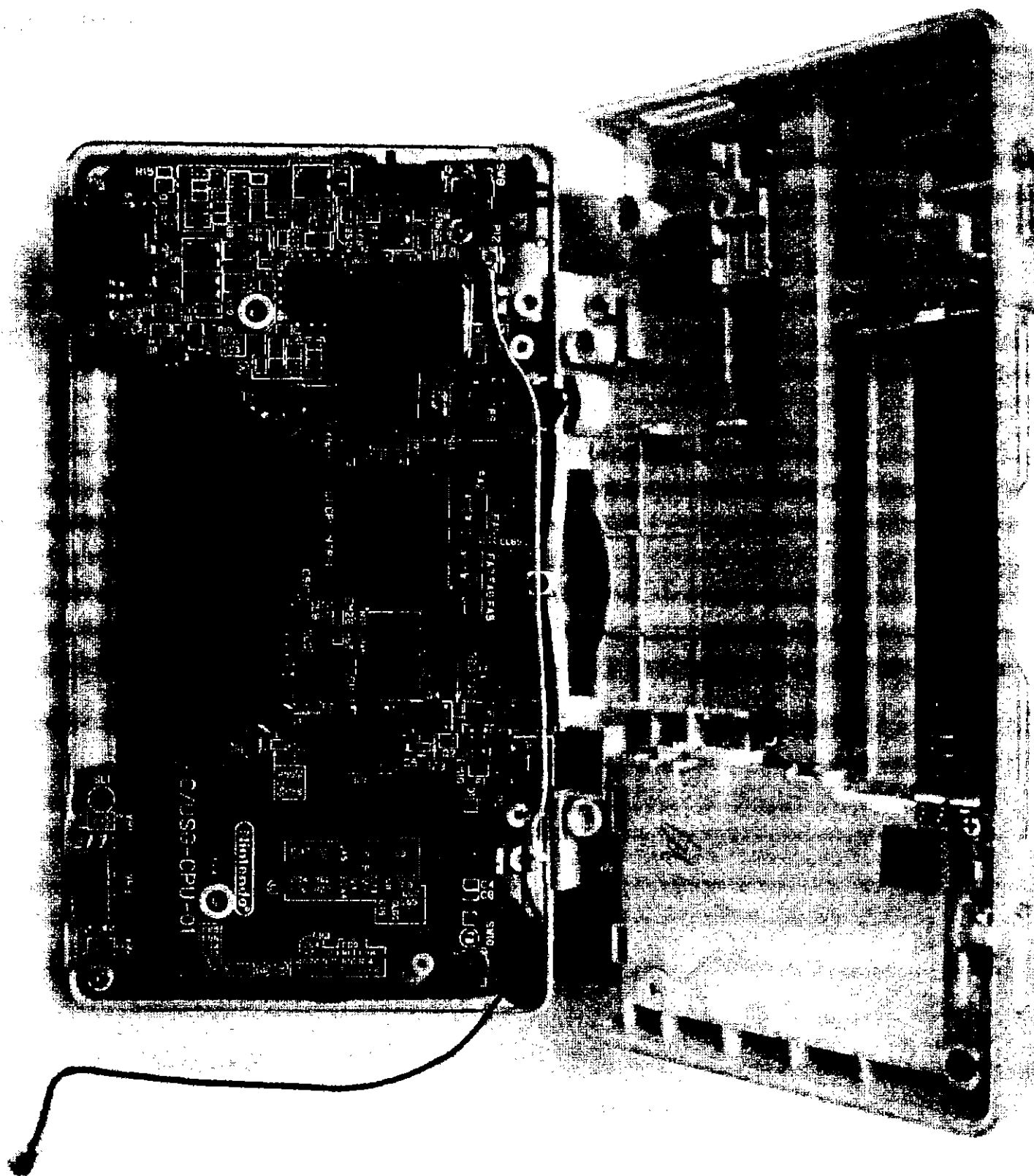
■ PACKAGES


FUJITSU

EXHIBIT F







U1 RTC

C1

U1 CPU NTR-1

C5

CL9

CL5

EM26 R65

C11

NTR-SRAM

F2

07

R558
C98
R58

Nintendo

CL17

010

C94

R62

C76

R27

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